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7 Attorney for Plaintiff

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
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11 \* \* \*

12 UNITED STATES OF AMERICA, ) **2:17-cr-00402-RCJ-CWH**  
13 )  
14 Plaintiff, )  
15 v. )  
16 SHAQUILLA STAFFORD, )  
17 Defendant. )  
18 \_\_\_\_\_)

19 **STIPULATION FOR EXTENSION OF TIME**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
21 States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United  
22 States of America, and Crane Pomerantz, counsel for Defendant SHAQUILLA STAFFORD, that  
23 the date for the Government to file a response to the Defendant's Motion to Suppress Evidence  
24 (ECF No. 33) be extended for one week, specifically to **May 11, 2018**.

25 This stipulation is entered for the following reasons:

26 1. The Defendant's Motion was filed and served on April 20, 2018. *See* ECF No.  
27 33. The Government's response deadline is presently May 4, 2018.  
28

1           2.       Counsel for the Government will be out of the district from May 2, 2018 through  
2 the present deadline and therefore requires additional time to respond.

3           3.       The Defendant is incarcerated, but she does not object to the continuance of the  
4 Government's response deadline.

5           4.       The additional time requested herein is not sought for purposes of delay, but to  
6 allow counsel for the Government adequate time to respond.

7           5.       Additionally, denial of this request for continuance could result in a miscarriage  
8 of justice.

9           6.       This is the first stipulation filed herein to continue the Government's response  
10 deadline.

11           DATED: May 3, 2018.

12  
13           \_\_\_\_\_  
14           /s/  
15           ALLISON REESE  
16           Assistant United States Attorney  
17           Counsel for the United States

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13           \_\_\_\_\_  
14           /s/  
15           CRANE M. POMERANTZ  
16           SklarWilliams, PLLC  
17           Counsel for Defendant SHAQUILLA STAFFORD

1  
2 UNITED STATES DISTRICT COURT  
3 DISTRICT OF NEVADA

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6 UNITED STATES OF AMERICA, ) **2:17-cr-00402-RCJ-CWH**  
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12 SHAQUILLA STAFFORD, )  
13 )  
14 Defendant. )  
15 \_\_\_\_\_)

16 **FINDINGS OF FACT**

17 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
18 Court finds that:

19 1. The Defendant's Motion was filed and served on April 20, 2018. *See* ECF No.  
20 33. The Government's response deadline is presently May 4, 2018.

21 2. Counsel for the Government will be out of the district from May 2, 2018 through  
22 the present deadline and therefore requires additional time to respond.

23 3. The Defendant is incarcerated, but she does not object to the continuance of the  
24 Government's response deadline.

25 4. The additional time requested herein is not sought for purposes of delay, but to  
26 allow counsel for the Government adequate time to respond.

27 5. Additionally, denial of this request for continuance could result in a miscarriage  
28 of justice.

6. This is the first stipulation filed herein to continue the Government's response  
deadline.

...

1 For all of the above-stated reasons, the ends of justice would best be served by a  
2 continuance of the Government's response deadline.

3 **CONCLUSIONS OF LAW**

4 The additional time requested herein is not sought for purposes of delay, but to allow  
5 counsel for the Government adequate time to respond. The failure to grant said continuance  
6 would likely result in a miscarriage of justice.

7 **ORDER**

8 IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for the  
9 Government to respond to the Defendant's Motion to Suppress is extended until  
10 May 11, 2018.

11 DATED this 3rd day of May, 2018.

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15 UNITED STATES MAGISTRATE JUDGE  
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